

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,
Debtors.¹

PROMESA
Title III

No. 17 BK 3283-LTS

(Jointly Administered)

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

PUERTO RICO HIGHWAYS AND
TRANSPORTATION AUTHORITY,
Debtor.

PROMESA
Title III

No. 17 BK 3567-LTS

**INFORMATIVE MOTION AND NOTICE OF REQUEST TO BE
HEARD AT THE HEARING ON CONFIRMATION OF HTA PLAN
OF ADJUSTMENT AND AUGUST 17-18, 2022 OMNIBUS HEARING**

Franklin Advisers, Inc. and Nuveen Asset Management (collectively, the “**HTA Insured Bondholder Group**”), submits this informative motion in response to the Court’s *Order Regarding Procedures for Hearing on Confirmation of HTA Plan of Adjustment and August 17-*

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“**COFINA**”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“**HTA**”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“**ERS**”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“**PREPA**”) (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“**PBA**”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

18, 2022, *Omnibus Hearing* (the “**Order**”) setting forth guidelines for parties wishing to be heard at the hearing on confirmation of the HTA plan of adjustment and the August 17-18, 2022 omnibus hearing (the “**Hearing**”).

1. Matthew M. Madden and Douglas Buckley of Kramer Levin Naftalis & Frankel LLP and Manuel Fernández-Bared and Linette Figueroa-Torres of Toro Colón Mullet P.S.C. will appear on behalf of the HTA Insured Bondholder Group at the Hearing.

2. Messrs. Madden and Buckley will speak on behalf of the HTA Insured Bondholder Group in connection with the *Limited Objection of the HTA Insured Bondholder Group to the Third Amended Title III Plan of Adjustment of the Puerto Rico Highways and Transportation Authority* and also reserve the right to be heard on any matter raised by any party at the Hearing related to the Title III cases, or any adversary proceeding pending in the Title III Cases, or the interests of the HTA Insured Bondholder Group.

3. Mr. Fernández-Bared and Ms. Figueroa-Torres do not intend to speak at the hearing but request to be present in the courtroom in San Juan with Messrs. Madden and Buckley.

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We hereby certify that, on this same date, we electronically filed the foregoing with the clerk of the Court using the CM/ECF system, which will notify the attorneys of record.

RESPECTFULLY SUBMITTED,

In San Juan, Puerto Rico, today July 28, 2022.

TORO COLÓN MULLET P.S.C.

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** Pro Hac Vice Application Forthcoming*

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***Admitted Pro Hac Vice*

Counsel for the HTA Insured Bondholder Group

EXHIBIT A

EXHIBIT A
PARTY APPEARANCE SHEET

Name of Party		Attending the Confirmation Hearing.
ATTORNEY 1	Appearance Method	In person - PR
	Name	Matthew M. Madden
	Law Firm	Kramer Levin Naftalis & Frankel LLP
	Email	mmadden@kramerlevin.com
	Phone Number	(212) 775-4500
	Docket Entry No. of Notice of Appearance	1310
ATTORNEY 2	Appearance Method	In person - PR
	Name	Douglas Buckley
	Law Firm	Kramer Levin Naftalis & Frankel LLP
	Email	dbuckley@kramerlevin.com
	Phone Number	(212) 715-9201
	Docket Entry No. of Notice of Appearance	1310
ADDITIONAL ATTORNEY OBSERVATION	Complete the below information for each attorney appearing for observation purposes. Name Observation Method • CourtSolutions Listen Only • In Person – PR • In Person – NY Law Firm Email Phone Number	Manuel Fernández-Bared In Person - PR Toro Colón Mullet P.S.C. mfb@tcm.law (787) 751-8999
ADDITIONAL ATTORNEY OBSERVATION	Complete the below information for each attorney appearing for observation purposes. Name Observation Method • CourtSolutions Listen Only • In Person – PR • In Person – NY Law Firm Email Phone Number	Linette Figueroa-Torres In Person - PR Toro Colón Mullet P.S.C. lft@tcm.law (787) 751-8999
Pursuant to the Hearing Procedures Order ¶ 1, in-person participation by counsel will be prioritized in the following manner: the Financial Oversight and Management Board for		

Puerto Rico and the Puerto Rico Fiscal Agency and Financial Advisory Authority shall each be permitted 4 attorneys present in Courtroom 3 in San Juan, and each other party-in-interest shall be permitted 2 attorneys present in Courtroom 3 in San Juan.

Space permitting, additional attorneys who wish to view but not participate in the Confirmation Hearing or August Omnibus Hearing may gain admittance to the live courtroom (Courtroom 3 in San Juan), or the live feed which will be broadcasted in Courtroom 17C in New York on a firstcome first-served basis. All attorneys who wish to observe in person must be listed on this appearance sheet.

EXHIBIT B

EXHIBIT B
PARTY WITNESS COVER SHEET

Name of Party		HTA Insured Bondholder Group	
Does the Party intend to offer a witness		No	
Total Number of Witnesses		N/A	
Witness Name	Expert or Fact Witness	Is interpreter required? (Proponent of witness must provide certified interpreter)	Scope of Testimony
N/A	N/A	N/A	N/A

EXHIBIT C

EXHIBIT C
PARTY EXHIBIT COVER SHEET²

Name of Party		HTA Insured Bondholder Group (“HTA IBG”)
Does the Party intend to offer evidence?		Yes (as needed)
Docket Entry No. for Party Exhibit List		21619- in 17-3283
Exhibit Identifier	Docket Entry No. of Exhibit	Is there a pending request to seal this Exhibit?
HTA IBG’s Exhibit 1	21619-1	No
Pursuant to Bankruptcy Local Rule 9037-1(a), parties and counsel are solely responsible for redacting the personal identifiers enumerated in Fed. R. Bank. P. 9037(a).		

² The HTA Insured Bondholder Group reserves all rights, including the right to use exhibits identified on other parties’ exhibits lists, the right to use additional exhibits for cross-examination or rebuttal if necessary, and the right to revise, amend, and/or supplement this list, for reasons including but not limited to adjournment of the confirmation hearing or modification of the Plan